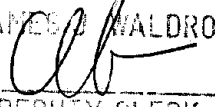


U.S. BANKRUPTCY COURT
FILED
NEWARK, NJ

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JAMES J. WALDRON
BY: 
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CHRISTOPHER A. ERRANTE, ESQ.
518 Stuyvesant Avenue
Lyndhurst, NJ 07071
201-672-0202
Attorney for Petitioner,
PHILIP CASTAGNA

In Re:
PHILIP C. CASTAGNA (Debtor)
18 Elm Place
Nutley, NJ 07110,

PETITIONER

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

CASE NO: 12-16350-DHS
CHAPTER: 7

**Notice of Motion to Vacate the sale
of Debtor's Business**

TO: Clerk
United States Bankruptcy Court
District of New Jersey
M.L. King, Jr., Federal Bldg. & Courthouse
50 Walnut St.
Newark, NJ 07102

Jeffrey Lester, Esq.
Braverman & Lester
374 Main St.
Hackensack, NJ 07601
Bankruptcy Trustee

Scott M. Albrecht, Esq.
198 Orange Avenue
Suffern, NY 10901
Attorney for Purchasers

HKG: 2/19/13
10-


SIR/MADAM:

PLEASE TAKE NOTICE, on ~~Friday, January 25~~
, 2013 at 9:00 A.M., in the forenoon or as soon thereafter as counsel may be heard, the undersigned, attorney for Petitioner, Philip C. Castagna, shall apply to the United States Bankruptcy Court, District of New Jersey, Courthouse, 50 Walnut ST., Newark, New Jersey for an order adding Vacating the sale of Petitioner Castagna's Verizon retail store. We shall rely upon the attached Certification of Petitioner and Exhibits in support hereof.

PLEASE TAKE FURTHER NOTICE, pursuant to Rule 1:6-2 the undersigned requests oral argument.

A proposed form of Order is annexed.

CHRISTOPHER A. ERRANTE, ESQ.
Attorney for Petitioner,
Philip C. Castagna

By: 
Christopher A. Errante, Esq.

Dated: January 10, 2013